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June 1, 2021

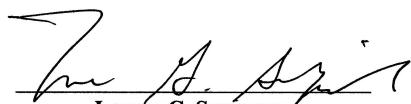
**VIA ELECTRONIC FILING**

Hon. Lorna G. Schofield, U.S.D.C.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
(212) 805-0288

The application is GRANTED. Defendant's motion for summary judgment and supporting papers shall be filed under seal, with access restricted to the parties identified in the Appendix to this filing. By **June 4, 2021**, Defendant shall file its summary judgment motion and supporting papers in redacted form on the public docket.

SO ORDERED

Dated: June 2, 2021  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *Sankalp Bhatnagar v. Parsons School of Design and the New School, Civil Action No. 20-cv-2321 (LGS)*

Dear Judge Schofield,

Pursuant to Rule I. D. of your Individual Rules and Procedures for Civil Cases, we write on behalf of Defendant Parsons School of Design, a school in the New School, to request leave to file certain documents under seal in the above-referenced matter.

In accordance with the Court's pre-trial order (Dkt. No. 34), Defendant has filed a motion for summary judgment. Defendant submits that its brief in support of this motion, the accompanying exhibits and its Rule 56.1 statement contain certain information and/or documents that have been designated by the Parties as confidential under the governing protective order (Dkt. No. 22) because they contain information protected from disclosure under the Family Educational Rights and Privacy Act and personally sensitive, confidential information relating to plaintiff's medical history that qualifies as "protected health information" under HIPAA. Defendant therefore requests leave to file their motion for summary judgment and any accompanying confidential materials under seal.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC



Michael P. Collins

cc: Counsel of Record  
encl

## Appendix

As required by Rule I.D.3 of the Judge's Individual Rules and Procedures for Civil Cases, the following are all parties and attorneys of record who should have access to documents filed under seal:

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